

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Adona Post Office
Adona, Arkansas

Docket No. A2012-16

PUBLIC REPRESENTATIVE COMMENTS
SUPPORTING REMAND
(December 28, 2011)

On October 17, 2011, the Commission received an appeal from Bill D. Green, Mayor (Petitioner), objecting to the closing of the Adona, Arkansas, Post Office.¹ On October 20, 2011, the Commission issued Order No. 917 accepting the appeal, directing the Postal Service to file the administrative record by November 1, 2011, establishing a procedural schedule, and naming the undersigned Public Representative.² On November 1, 2011, the Postal Service filed the Administrative Record.³ The Postal Service will serve Adona via rural carrier.⁴

The Postal Service asserts that it followed all procedures and considered all factors required by law.⁵ It does appear that the Postal Service followed proper procedures. However, it fails to demonstrate that patrons of the Adona Post Office will

¹ Petition for Review Received from the City of Adona, AR Regarding the Adona, AR Post Office 72001, October 17, 2011 (Petition).

² Notice and Order Accepting Appeal and Establishing Procedural Schedule, October 20, 2011 (Order No. 917).

³ United States Postal Service Notice of Filing, November 1, 2011.

⁴ Final Determination (FD) at 1. The Final Determination is included in the Administrative Record (AR) as Item No. 47.

⁵ United States Postal Service Comments Regarding Appeal, December 9, 2011, at 3 (Postal Service Comments).

receive effective and regular service from a rural route carrier. Specifically, the Postal Service does not include any added cost for providing rural route service to customers who do not move their PO Boxes from Adona to Perry. See FD at 4 (zero cost for Replacement Service); AR, Item No. 17, at 2 (zero additional rural route boxes and zero additional miles). In its remand of the final determination to close the Monroe, Arkansas, Post Office the Commission stated

Rural delivery service can provide many of the benefits cited by the Postal Service. However, it is unclear how or if rural delivery service will be provided given that the record indicates no cost for providing this service.⁶

The Postal Service should be given an opportunity to explain this anomaly.

Petitioner asserts that the Adona Post Office serves

a small rural, economically depressed, poverty level area with primarily retired and elderly citizens. Many of whom also have physical limitations. . . . Most do not have the financial means to install proper mailboxes at their residen[ces] or the physical means to install them.

Petition at 3. Petitioner then asks

Does the United States Postal Service (USPS) have any intentions of installing these mailboxes at their expense, not the residen[ts'] expense?

Id. The Postal Service responds that

the rural carrier will be able to assist postal customers in a similar capacity to the current OIC. To the extent that postal customers have physical *and financial* limitations, the Postal Service will work with these customers to ensure that they receive regular and effective postal services. Special provisions are made for hardship cases and special customer needs.

Postal Service Comments at 6-7 (emphasis added). The Postal Service cites page 3 of the final determination as support for this statement.

As best the Public Representative can recollect, this is the first time that the Postal Service has offered to assist rural route customers who have “financial limitations.” Unfortunately, the record does not contain a discussion of financial

⁶ Docket No. A2011-40, Order Remanding Determination, November 18, 2011, at 9 (Order No. 982).

hardship. The source cited by the Postal Service (FD at 3) addresses a customer concern for senior citizens. The Postal Service response reads as follows.

Carrier service is beneficial to many senior citizens and those who face special challenges because the carrier can provide delivery and retail services to roadside mailboxes or Centralized Box Units. Customers do not have to make a special trip to the Post Office for service. Special provisions are made for hardship cases or special customer needs.

FD at 3, Concern Nos. 6, 11. This concern was apparently raised in a questionnaire response, see AR, Item Nos. 22 at 1, 23 at 1-2, and at the community meeting. See *id.*, Item No. 25, at 1-2. This is a standard Postal Service response⁷ and appears directed at patrons who express a concern for senior citizens not being able to drive to a more distant Post Office. It is not possible to determine whether this response was generated as the result of a customer mentioning financial hardship. The administrative record does not contain Postal Service response letters addressed to specific customers that can be matched to individual questionnaire responses. See *generally* AR, Item No. 22.

The record contains conflicting or inaccurate statements about effective and regular service for patrons of the Adona Post Office. The Final Determination should be remanded.

Respectfully submitted,

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⁷ See Handbook PO-101, August 2004, at 113, available at <http://www.prc.gov/Docs/63/63880/Handbook%20PO%20101.pdf> : **Concern:** Customers were concerned about senior citizens.

Response: Carrier service is beneficial to many senior citizens and those who face special challenges because the carrier can provide delivery and retail services to <roadside mailboxes or CBUs>. Customers do not have to make a special trip to the Post Office for service. Special provisions are made for hardship cases or special customer needs. To request an exception for hardship delivery, customers may contact the <> postmaster for more information.